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**BellSouth Telecommunications, Inc.**  
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Columbia, SC 29201

**Patrick W. Turner**  
General Counsel-South Carolina

803 401 2900  
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patrick.turner@bellsouth.com

November 1, 2005

Mr. Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

RECEIVED  
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PUBLIC SERVICE COMMISSION

Re: Petition of MCImetro Access Transmission Services, LLC for Arbitration  
of Certain Terms and Conditions of Proposed Agreement with BellSouth  
Telecommunications, Inc. Concerning Interconnection and Resale under  
the Telecommunications Act of 1996  
Docket No. 2005-276-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of a Motion for Extension of  
Time For Concluding the Resolution of Unresolved Issues in the above-referenced  
matter. By copy of this letter, I am serving the same on all parties of record.

Sincerely,

A handwritten signature in black ink that reads "Patrick Turner". The signature is fluid and cursive, with the first name "Patrick" and last name "Turner" clearly distinguishable.

Patrick W. Turner

PWT/nml  
Enclosures  
cc: All Parties of Record  
DM5 # 607946

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

In Re: Petition of MCImetro Access )  
Transmission Services, LLC for )  
Arbitration of Certain Terms and )  
Conditions of Proposed Agreement )  
with BellSouth Telecommunications, )  
Inc. Concerning Interconnection and )  
Resale under the )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

Docket No. 2005-276-C

**MOTION FOR EXTENSION OF TIME FOR  
CONCLUDING THE RESOLUTION OF UNRESOLVED ISSUES**

BellSouth Telecommunications, Inc. (“BellSouth”) respectfully requests that the Public Service Commission of South Carolina (“Commission”) extend the time for concluding the resolution of unresolved issues in this docket. MCImetro Access Transmission Services, LLC (“MCI”) has authorized BellSouth to state that MCI joins in this request, and the Office of Regulatory Staff (“ORS”) has authorized BellSouth to state that it does not oppose this request.

On September 14, 2005, MCI filed a petition asking the Commission to arbitrate, pursuant to Section 252(b) of the Telecommunications Act of 1996 (“the federal Act”), certain terms and conditions of a proposed interconnection agreement between MCI and BellSouth Telecommunications, Inc. While the federal Act sets forth a timeframe for “conclude[ing] the resolution of unresolved issues” in such proceedings, *see* 47 U.S.C. §252(b)(4)(C), BellSouth believes that this Commission is authorized to extend that timeframe with the agreement of the parties. In fact, many state Commissions throughout

the country grant such extensions with the consent of the parties as a matter of course, and this Commission has granted such an extension in recent arbitration proceedings. Such an extension is particularly appropriate and beneficial in arbitration proceedings like this docket, in which the parties are arbitrating the same or similar issues before several state Commissions and are working cooperatively to schedule the various hearings in these proceedings at mutually-agreeable intervals. BellSouth and MCI are in the process of finalizing proposed hearing dates to share with the ORS and then submit to the Commission for consideration and will file these proposed dates in the near future.

WHEREFORE, for the reasons stated above, BellSouth, with the consent and support of MCI and without opposition from the ORS, respectfully requests that the Commission issue an order extending the timeframe for resolving the unresolved issues in the above-captioned arbitration proceeding.

Respectfully submitted on this the 1<sup>st</sup> day of November, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Patrick W. Turner", is written over a horizontal line.

PATRICK W. TURNER  
Suite 5200  
1600 Williams Street  
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(803) 401-2900

608014

STATE OF SOUTH CAROLINA                    )  
  )  
COUNTY OF RICHLAND                    )        CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused a Motion for Extension of Time For Concluding the Resolution of Unresolved Issues in Docket No. 2005-276-C to be served upon the following this November 1, 2005:

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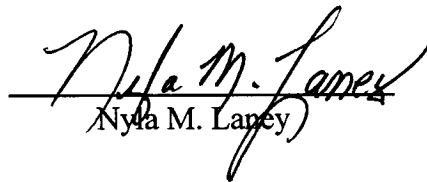
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Nyla M. Laney